

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

BRYAN JOSE GALEANA MENDOZA,  
individually,

Plaintiff,

vs.

PIERCE COUNTY, a local governmental  
entity, BRIAN JOHNSON, in his individual  
and official capacities, ED TROYER, in his  
individual and official capacities, and DOES  
1-9, in their individual and official  
capacities,

Defendants.

No. 3:23-cv-06025-TMC

**STIPULATED MOTION AND  
ORDER TO CONTINUE TRIAL  
DATE**

**NOTED FOR: August 13, 2024**

WITHOUT ORAL ARGUMENT

COME NOW the parties, by and through their counsel of record and submit the following  
Stipulation and Proposed Order To Continue Trial Date.

Trial in this matter is set to begin on **June 16, 2025**. Disclosure of expert testimony under  
FRCP 26(a)(2) is to be disclosed by **November 18, 2024**. Discovery is set to be completed by  
**January 17, 2025**.

The parties request this extension because they are still actively involved in the discovery  
process, including exchanging written materials, coordinating with experts and preparing for  
depositions. The parties are in the process of working together to efficiently advance the case  
toward trial. However, this case involves a significant amount of video recordings, including

STIPULATION AND ORDER TO CONTINUE  
TRIAL DATE

1 of 5 | 3:23-cv-06025-TMC

lengthy body camera and dash camera videos from many different Pierce County Sheriff's Office (PCSO) deputies. Additionally, there are more than 1,000 pages of documents and multiple audio witness statements to review. There are also volumes of medical records and many potential witnesses for which depositions will be necessary, making the discovery process longer than originally planned. Because the discovery process is taking longer than had anticipated, and because significant fact discovery must be completed in order for experts to develop their opinions, the parties have agreed and respectfully request that the Court continue the trial to a date **on or after January 11, 2026**, with corresponding case schedule dates consistent with the new trial date.

STIPULATED TO this 13<sup>th</sup> day of August, 2024.

COCHRAN DOUGLAS, PLLC

By: /s/ Loren A. Cochran

Loren A. Cochran, WSBA No. 32773

Nicholas B. Douglas, WSBA No. 49786

Tiffany L. Wilke, WSBA No. 49874

Attorneys for Plaintiff

PIERCE COUNTY PROSECUTING  
ATTORNEY/CIVIL DIVISION

By: /s/ Kristal M. Cowger (e-signed with permission 8/13/2024)

Kristal M. Cowger, WSBA No. 43079

Jonathan R. Salamas, WSBA No. 39781

Attorneys for Defendants

STIPULATION AND ORDER TO CONTINUE  
TRIAL DATE

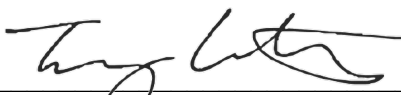
2 of 5 | 3:23-cv-06025-TMC

**ORDER**

THIS MATTER having come before the undersigned Judge of the above-entitled court based upon the Stipulation of the parties To Continue the Trial Date; and the Court being fully advised, now, therefore, it is hereby

ORDERED, ADJUDGED AND DECREED that the Stipulated Motion To Continue Trial Date is **GRANTED**. The trial date in this matter, currently scheduled for June 16, 2025 shall be continued to January 12, 2026, and a new case scheduling order will be issued.

DONE this 14th day of August, 2024.

  
\_\_\_\_\_  
TIFFANY M. CARTWRIGHT  
United States District Judge

Presented by:

COCHRAN DOUGLAS, PLLC

By: /s/ Loren A. Cochran

Loren A. Cochran, WSBA No. 32773

Nicholas B. Douglas, WSBA No. 49786

Tiffany L. Wilke, WSBA No. 49874

Attorneys for Plaintiff

STIPULATION AND ORDER TO CONTINUE  
TRIAL DATE

3 of 5 | 3:23-cv-06025-TMC

 **COCHRAN  
DOUGLAS**  
Attorneys at Law  
2501 Fawcett Avenue  
Tacoma, WA 98402  
www.cochrاندouglas.com

1 APPROVED AS TO FORM; NOTICE OF  
2 PRESENTATION WAIVED:

3 PIERCE COUNTY PROSECUTING  
4 ATTORNEY/CIVIL DIVISION

5 /s/ Kristal M. Cowger (e-signed with permission 8/13/2024)

6 Kristal M. Cowger, WSBA No. 43079

7 Jonathan R. Salamas, WSBA No. 39781

8 Attorneys for Defendants  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

STIPULATION AND ORDER TO CONTINUE  
TRIAL DATE

4 of 5 | 3:23-cv-06025-TMC

**CERTIFICATE OF SERVICE**

I, **Kim Snyder**, hereby declare under penalty of perjury under the laws of the State of Washington that I am employed at Cochran Douglas, PLLC and that on today's date, I served the foregoing via ECF /U.S. Regular Mail / **Email** and/or Facsimile by directing delivery to all counsel of record.

Kristal M. Cowger, WSBA No. 43079  
Jonathan R. Salamas, WSBA No. 39781  
930 Tacoma Avenue South, Suite 946  
Tacoma, WA 98402  
253-798-6732  
kristal.cowger@piercecountywa.gov  
jonathan.salamas@piercecountywa.gov  
Attorneys for Defendants

DATED this 13th day of August, 2024.

/s/ Kim Snyder  
Legal Assistant

STIPULATION AND ORDER TO CONTINUE  
TRIAL DATE

5 of 5 | 3:23-cv-06025-TMC